

Exhibit D

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA**

**NOTICE OF PROPOSED PARTIAL SETTLEMENT OF CLASS ACTION, FAIRNESS
HEARING AND RIGHT TO APPEAR**

If you purchased or held legal title to any money or cryptocurrency deposited or invested through the Voyager or purchased a Voyager Earn Program Account (“EPAs”) or purchased VGX (a Voyager token), you could be affected by class action settlements.

Please read this Notice carefully.

A federal court authorized this Notice. This is not an advertisement or a solicitation from a lawyer.

On _____, 2024 the Honorable Roy K. Altman of the United States District Court for the Southern District of Florida entered an order certifying a class of all persons or entities who from October 23, 2019 through _____, 2024 purchased or enrolled in an EPA or purchased VGX Tokens. This order pertains to a lawsuit alleging that Voyager Promoters aided, abetted, and/or otherwise participated in a central conspiracy to promote unregistered securities and to misappropriate customer funds on the Voyager cryptocurrency exchange.

Partial settlements of the class action lawsuit (the “Settlement Agreements”) have now been reached with certain Defendants in this litigation, namely, Robert Gronkowski (“Gronkowski”), Victor Oladipo (“Oladipo”), and Landon Cassill (“Cassill”) [collectively referred to herein as the “Settling Defendants”]. These settlements are “partial” in that they resolve only those claims against the Settling Defendants, not claims against other Defendants not party to the Settlement Agreements (“Non-Settling Defendants”).

You are a settlement class member (“Settlement Class Member”) if you are a person or entity that from October 23, 2019 through _____, 2024: purchased or enrolled in an EPA or purchased VGX Tokens. Excluded from the Class are The Settling Defendants and their officers, directors, affiliates, legal representatives, and employees, the Voyager Defendants and their officers, directors, affiliates, legal representatives, and employees, any governmental entities, any judge, justice, or judicial officer presiding over this matter and the members of their immediate families and judicial staff.

If you are a Settlement Class Member, you are included in the partial settlements with the Settling Defendants. You are also included in the ongoing lawsuit against the Non-Settling Defendants.

Please read this Notice carefully. Your legal rights will be affected whether you act or do not act. You now have to make a choice to preserve your legal rights.

Questions? Visit www.xxxx.com

YOUR LEGAL RIGHTS AND OPTIONS IN THE PARTIAL SETTLEMENTS		
DO NOTHING	<ul style="list-style-type: none"> • Receive benefits from the partial settlements • Give up your rights to sue the Settling Defendants for the legal claims in this case • Be bound by the partial settlements 	
ASK TO BE EXCLUDED (OPT-OUT)	<ul style="list-style-type: none"> • Receive no benefits from the partial settlements • Keep your right to file or continue your own lawsuit concerning the legal claims in this case against one or more of the Settling Defendants as to which you opt out 	Received no later than Month x, 2024
COMMENT OR OBJECT	<ul style="list-style-type: none"> • Tell the Court what you like or do not like about the partial settlements • You will still be bound by the partial settlements, and you will still receive benefits • You may also ask to speak at the Fairness Hearing about your comment or objection, but you don't have to 	Received no later than Month x, 2024
ATTEND THE FAIRNESS HEARING	<ul style="list-style-type: none"> • Ask to speak in Court about the partial settlements — You or your own attorney are welcome to come at your own expense • File your Notice of Intention to Appear by Month x, 2024 	Month x, 2024 at x:xx x.m. ET

ONGOING LAWSUIT WITH NON-SETTLING DEFENDANTS

- The partial settlements have no effect on your rights against the Non-Settling Defendants.
- You will remain a Class Member in the ongoing lawsuit against the Non-Settling Defendants and keep the possibility of getting money or other benefits from the Non-Settling Defendants that may come from trial or settlement.
- You do not need to take additional action to remain in the Class or be a part of the ongoing lawsuit against the Non-Settling Defendants.
- There is no money available now from any of the Non-Settling Defendants, and there is no guarantee there will be.
- The outcome of the ongoing lawsuit against the Non-Settling Defendants is unknown.
- You will receive other notices from the Court when there are other important developments that may require you to make a decision or take action.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THE PARTIAL SETTLEMENTS OR THE CLAIM PROCESS.

- This Notice explains your legal rights and options—and the deadlines to exercise them.
- The Court in charge of this case still has to decide whether to approve the partial settlements with the Settling Defendants.
- Payments may be made if the Court approves the partial settlements, and after appeals, if any, are resolved, and after the Court orders that the Settlement Fund (as described in Question 13 below) be distributed. Please be patient. Please do not call the Court or the court clerk's office directly.
- The outcome of the ongoing class action lawsuit against the Non-Settling Defendants is not yet known. You will be notified if money or benefits are obtained from any of the Non-Settling Defendants through settlement(s) or trial.
- This is not a lawsuit against you.
- This Notice summarizes the proposed partial settlements with the Settling Defendants. For the precise terms and conditions of the partial settlements, please see the Settlement Agreements available at www.flsd.uscourts.gov, contact Class Counsel at (), or access the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.flsd.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Southern District of Florida, 400 North Miami Avenue, Miami, FL 33128, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.

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BASIC INFORMATION

1. Why did I receive this Notice?

You received this Notice because Voyager's records show you may be a Settlement Class Member.

Settlement Class Members have the right to know about the partial settlements of a class action lawsuit, and about their legal rights and options before the Court holds a Fairness Hearing to decide whether to grant final approval to the partial settlements. This Notice explains the lawsuit, the partial settlements, and your legal rights. It also explains what benefits from the partial settlements are available at this time, who is eligible to participate, and how to share in the partial settlements.

If the Court approves the partial settlements, and after any objections and appeals are resolved, Class Counsel will disburse the Settlement Fund (as described in Question 13 below) in one or more distributions at a time to be determined by the Court. The Court has preliminarily approved the partial settlements. If you are a Settlement Class Member, you have legal rights and options that you may exercise before the Court considers whether it will grant final approval to the proposed partial settlements at the Fairness Hearing. The Court will hold the Fairness Hearing on _____ to decide whether the proposed partial settlement with each of the Settling Defendants is fair, reasonable, and adequate. The Court will also consider Class Counsel's request for payment of attorneys' fees, class representative general release payments, and reimbursement of litigation expenses.

If you wish to comment on (including object to) or exclude yourself from one or more of the partial settlements, you must do so by following the procedures described below. If you do nothing, you will receive money from the partial settlements at a time to be determined by the Court, and you will be bound by any final judgment concerning the Settling Defendants.

2. What is this lawsuit about?

The lawsuit claims that the Settlement Defendants aided, abetted, and/or otherwise participated in a central conspiracy to promote unregistered securities and to misappropriate customer funds on the Voyager cryptocurrency exchange before the July 2022 collapse of the Voyager cryptocurrency exchange platform and subsequent bankruptcy.

To obtain more information about the claims in this lawsuit, you can view the complaint and other court documents in this case at [www._____](http://www._____.).

3. Why is this a class action, and who is involved?

In a class action lawsuit, one or more people "Named Plaintiffs" or "Class Representatives" sue on behalf of other people who have similar claims. The people and companies with similar claims together are a "Class" and each is called a "Class Member." In a class action, the court resolves the issues for all Class Members, except for those who exclude themselves (or "opt out") from the Class.

4. Why are there settlements?

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The Court has not yet found in favor of Plaintiffs or Defendants. While the lawsuit is still pending before the United States District Court, Plaintiffs and the Settling Defendants have agreed to settlements that, if approved, will bring the claims against the Settling Defendants to an end. This way, Plaintiffs and the Settling Defendants avoid the uncertainty of continuing the case between them. They also avoid the cost and delay of further litigation, and Settlement Class Members will receive the benefits of the settlements.

5. Why are the settlements “partial”?

Although the settlements with the Settling Defendants fully resolve the Settlement Class Members’ claims against the Settling Defendants (see response to Question 16), the settlements only partially resolve the case, which will continue against the Non-Settling Defendants (see response to Question 6). For this reason, the settlements with the Settling Defendants are partial settlements.

6. Why is the lawsuit continuing if there are settlements?

The Settling Defendants have agreed to settle this case. The remaining Defendants have not agreed to settle, so the lawsuit will continue as a class action against them, the Non-Settling Defendants. Money may become available in the future as a result of additional settlements with the Non-Settling Defendants or following a trial but there is no guarantee that will happen.

7. What happens if Plaintiffs later reach a settlement with the Non-Settling Defendants?

The lawsuit will continue as a proposed class action against the Non-Settling Defendants on behalf of all Class Members. It is unknown whether Plaintiffs will obtain settlements with, or prevail at trial against, the Non-Settling Defendants. If there are additional settlements in the future, there will be notice of those settlements as well.

WHO HAS THE RIGHT TO PARTICIPATE IN THE PARTIAL SETTLEMENTS AND THE CLASS ACTION LAWSUIT?

8. Am I a Class Member who is part of the partial settlements and the ongoing class action lawsuit against the Non-Settling Defendants?

In general, investors or holders of funds deposited or invested with Voyager are Class Members, i.e., persons or entities are eligible for a payment from the proposed partial settlement when the funds are distributed, if they meet the following definition:

You are a settlement class member (“Settlement Class Member”) if you are a person or entity that, from October 23, 2019 through _____, 2024, purchased or enrolled in an EPA on the Voyager platform; and/or purchased VGX.

Excluded from the Class are The Settling Defendants and their officers, directors, affiliates, legal representatives, and employees, the Voyager Defendants and their officers, directors, affiliates, legal representatives, and employees, any governmental entities, any judge, justice, or judicial officer presiding over this matter and the members of their immediate families and judicial staff.

9. I am still not sure if I am included.

If you received this Notice, it is because you were listed as a potential Settlement Class Member. If you are still not sure whether you are included, you can get help by calling Class Counsel at (_____).

10. What are my rights as a Settlement Class Member?

You may do nothing and stay and receive benefits from the partial settlements at a time to be determined by the Court (see Question 26). Or you may exclude yourself from one or more of the partial settlements (see Question 20). You may also comment on or object to the proposed partial settlements and the request for fees and litigation expenses (see Question 20). You may also attend the Court's Fairness Hearing to speak in support of, or against, the Court's final approval of the proposed partial settlements and the request for fees and litigation expenses.

THE PARTIAL SETTLEMENTS BENEFITS

11. What do the partial settlements provide?

The Settling Defendants have agreed to provide collective **\$2,425,000** in monetary relief.

As a Settlement Class Member, you will give up, or "release," claims against the Settling Defendants. This release includes any claims made or that could have been made arising from the facts alleged in this class action lawsuit.

All of the specific terms of the partial settlements and the releases are described in more detail in the Settlement Agreements and in Question __ below. You can view or download copies of the Settlement Agreements at [www._____](http://www._____.).

12. How much money can I get from the partial settlements?

Given the nature of the relief agreed to between the Settling Defendants and the Settlement Class, the amount of payment will be determined in a further order as additional settlements or judgments are reached against the Non-Settling Defendants. Therefore, there is no current sum certain as to payments for the Settlement Class from the partial settlements. **Further notice will be sent to the Settlement Class once an Allocation Plan has been determined.**

13. When will I get my payment(s)?

As noted above, the Court is scheduled to hold a final Fairness Hearing on _____ to decide whether to approve the proposed partial settlements and the request for the payment of attorneys' fees and the reimbursement of litigation expenses. The Court may reschedule the Fairness Hearing or change any of the deadlines described in this Notice. There is no current guarantee of any payment. Please check [www._____](http://www._____.) or the Court's PACER site at <https://ecf.flsd.uscourts.gov> to confirm that the date has not changed, or for news of any such changes.

Any partial settlement payments to Settlement Class Members will be combined with further settlements or judgments from Non-Settling Defendants and then distributed after those settlements are approved, and after appeals, if any, are resolved in the Settlement Class's favor. Additional notice will be provided regarding the Allocation Plan for distribution. Class Counsel will remit the funds, through the Notice and Claims Administrator, in one or more distributions that may include future settlements with Non-Settling Defendants. Updates regarding the partial settlements and when any payments may be made will be posted at www..

14. What am I giving up under the partial settlements?

If you are a Settlement Class Member, unless you exclude yourself from one or more of the partial settlements with the Settling Defendants, you will remain in the Settlement Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against the Settling Defendants about the legal claims in this case. It also means that all of the Court's orders will apply to you and legally bind you, and that you agree to the "Releases of Claims" in the Settlement Agreement with the Settling Defendants, available at www..

In general (and subject to the precise terms as set forth in the Settlement Agreements), upon one or more of the Settlement Agreements becoming effective, the Named Plaintiffs and Settlement Class Members who did not otherwise properly and timely exclude themselves agree that the Settling Defendants will be completely released pursuant to and scope of the Released Claims and the binding terms of the proposed Settlement Agreements, which are available at www.. For example, a non-exhaustive list of the Released Claims include, but are not limited to any and all claims asserted or which could have been asserted in this litigation, including claims for: (1) sales of unregistered securities, (2) securities fraud, (3) sale of unqualified securities, (4) securities market manipulation, (5) control person liability, (6) civil conspiracy, (7) common law aiding and abetting fraud, (8) common law aiding and abetting fiduciary breach, (9) common law aiding and abetting conversion, (10) violation of California's Unfair Competition Law, (11) violation of California's False Advertising Law, (12) violation of Florida's Deceptive and Unfair Trade Practices Act, (13) negligent misrepresentation, (14) intentional misrepresentation, (15) fraudulent inducement, and (16) declaratory judgment.

To view the legally binding terms about the scope of the Released Claims, please refer to the proposed Settlement Agreements, which are available at www.. By participating in the partial settlements, you are not giving up your rights against the Non-Settling Defendants.

THE LAWYERS REPRESENTING YOU

15. Who represents me in this case?

The Court appointed the following law firms as Lead Class Counsel (also referred to as "Plaintiffs' Counsel" or "Class Counsel") to represent the Class:

David Boies
Boies Schiller Flexner LLP
333 Main Street

Questions? Visit www.xxxx.com

Armonk, NY 10504

Adam M. Moskowitz
The Moskowitz Law Firm, PLLC
P.O. Box 653409
Miami, FL 33175

16. Should I get my own lawyer?

You do not need to hire your own lawyer, because Class Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

17. How will the lawyers be paid?

At the Fairness Hearing, Class Counsel will seek payment of _____ (____% of the Settlement Fund) for legal fees for the work they have done in this case and up to _____ (approximately _____ of the Settlement Fund), for reimbursement of their reasonable litigation expenses. If the Court awards these payments, they will be made from the Settlement Fund along with administrative fees and expenses related to the provision of notice to the Settlement Class Members, administering the settlement payments, and distributing Settlement Funds to the Settlement Class Members at the time as ordered by the Court. Class Counsel will also ask the Court to approve general release settlements entered by the Class Representatives in the amount of \$ _____. You personally do not have to pay any of Class Counsel's fees, costs, or expenses.

EXCLUDING YOURSELF FROM THE PARTIAL SETTLEMENTS

18. How do I opt out of the partial settlements?

If you fall within the Settlement Class Member definition (see Question 8) but wish to keep the right to sue or continue to sue one or more of the Settling Defendants (at your own expense) about the legal issues in this case, then you must take steps to remove yourself from the Settlement Class. This is called excluding yourself from, or opting out of, the partial settlements. Opting out of the Settlement Class for purposes of the partial settlements described in this Notice will not affect your status as a member of the litigation Class in the ongoing litigation against the Non-Settling Defendants. You may also opt out of the Settlement Class with respect to one or more of the Settling Defendants but choose to remain in the Settlement Class with respect to the other Settling Defendants.

To exclude yourself from (or opt out of) one or more of the partial settlements with the Settling Defendants, you must send an Opt-Out Request Letter to the Notice and Claims Administrator at the address below indicating that you want to be excluded from the Settlement Class in *Voyager Collapse Settlement*; stating your full legal name, address, and telephone number; providing a

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statement that you purchased or enrolled in an EPA on the Voyager platform; and/or purchased VGX and you wish to opt out of the settlement.

You must include the following statement with your Opt-Out Request Letter: “I want to be excluded from the *Voyager Collapse Settlement*. I understand that by so doing, I will not be able to get any money or benefits from the partial settlement(s) with that/those Settling Defendant(s) in this case.”

This Opt-Out Request Letter must be signed and dated and include your telephone number.

If you request to be excluded from one or more of the partial settlements with Settling Defendants, you will not be legally bound by the partial settlement(s) with that/those Settling Defendant(s). You will be able to sue (or continue to sue) that/those Settling Defendant(s) in the future about the legal claims in this case.

If you ask to be excluded from one or more of the partial settlements with the Settling Defendant(s), you will not get any payment from that partial settlement(s) with respect to that/those Settling Defendant(s), and you cannot object to that/those partial settlement(s).

Exclusion/Opt-Out Request Mailing Information:

To exclude yourself from one or more of the partial settlements with Settling Defendant(s), you must submit your Opt-Out Request Letter postmarked via First Class United States Mail (or United States Mail for overnight delivery) no later than _____ (or received by the Notice and Claims Administrator by that date if sent by fax or email) at the following address:

Notice and Claims Administrator

Voyager Collapse Settlement

[address to come]

You cannot exclude yourself (opt out) by telephone.

19. If I do not exclude myself, can I sue the Settling Defendants for the same thing later?

No. If you are a Settlement Class Member, unless you exclude yourself from one or more of the partial settlements with one or more of the Settling Defendants, you give up the right to sue all of the Settling Defendants for the claims that the partial settlements resolve as more fully described in Question 16 above.

If you have a pending lawsuit against any of the Defendants, speak to your lawyer in that lawsuit immediately, because you may need to exclude yourself from the Settlement Class to continue your own lawsuit. The process for excluding yourself from the partial settlements is described in the preceding section.

20. If I exclude myself, can I get money from this case?

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No. If you exclude yourself from the partial settlements with the Settling Defendants, you will not receive money under that/those partial settlement(s). You will, however, remain eligible for payment from a share of the money recovered, if any, from Non-Settling Defendants in the future.

COMMENTING ON OR OBJECTING TO THE PARTIAL SETTLEMENTS

21. How do I tell the Court that I like or do not like the proposed partial settlements, and may I speak at the hearing?

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the partial settlements. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed partial settlements must be in writing. If you file a timely written objection, you may, but are not required, to appear at the Fairness Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must: (a) clearly identify the case name and number *Dominik Karnas, et al. v. Mark Cuban, et al.*, Case No.: 1:22-cv-22538-RKA (S.D. Fla.); (b) be submitted to the Court either by mailing them to the Class Action Clerk, United States District Court for the Southern District of Florida, 400 North Miami Avenue, Miami, FL 33128, or by filing them in person at any location of the United States District Court for the Southern District of Florida; and (c) be filed or postmarked on or before _____.

Be sure to include:

- Your full name, current address, and current telephone number, email address, and signature;
- include documentation or attestation sufficient to establish membership in any of the Classes;
- A detailed statement of your comment(s) or objection(s), including the grounds for your objection(s), if any, together with any documents you think support it.
- A signature by the person filing the objection, or his attorney;
- State any objections filed by the objector in the last seven years (case name, name of court and result of objection); and
- Provide dates for availability to Class Counsel for the Settlement Class Member's deposition;

You do not need to attend or speak at the Fairness Hearing (described in Question 24 below) for your comments or objections to be considered. If you would like to speak at the Fairness Hearing about your comments or objections to the partial settlements, you must add to your objection a statement that you intend to appear and speak at the hearing (for example, by stating "This is my

Notice of Intention to Appear in *Dominik Karnas, et al. v. Mark Cuban, et al.*, Case No.: 1:22-cv-22538-RKA (S.D. Fla.)”).

You will have no right to speak at the Fairness Hearing about these partial settlements if you choose to exclude yourself from the partial settlements, because the partial settlements no longer affect you if you opt out of them.

THE COURT’S FAIRNESS HEARING

22. When and where will the Court decide whether to approve the partial settlements?

The Court will hold a Fairness Hearing on _____ at _____ in Courtroom 12-4, on the 12th Floor of the United States District Court located at 400 North Miami Avenue, Miami, FL 33128. At the Fairness Hearing, the Court will consider the proposed partial settlements with the Settling Defendants and determine whether each is fair, reasonable, and adequate. The Court will also consider the request for attorneys’ fees and litigation expenses, and for payment of other administrative expenses. If there are written comments or objections, the Court will consider them. The Court will decide whether to allow people who have raised objections or comments to speak at the hearing. After the Fairness Hearing, the Court will separately decide whether to approve the partial settlements. The Court may reschedule the Fairness Hearing or change any of the deadlines described in this Notice. Please check [www._____](http://www._____.), for news of any such changes.

23. Do I have to come to the Fairness Hearing?

No. Class Counsel will be present at the Fairness Hearing to answer any questions the Court may have. You are welcome to come at your own expense. If you send comments or objections to the proposed partial settlements, you do not have to come to Court to talk about them. If you mailed your written comments or objections on time, the Court will consider them. You may also pay your own lawyer to attend, but such attendance is not necessary.

IF YOU DO NOTHING

24. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will receive the benefits of the partial settlements at a time to be determined by the Court. Any claims you might have against the Settling Defendants for the allegations in this case relating to Voyager will be released. This means that if you do nothing, other than the partial settlements, you will not be able to collect any damages from the Settling Defendants for claims as alleged in this lawsuit (or any other lawsuit).

GETTING MORE INFORMATION

25. Are more details about the partial settlements and the ongoing lawsuit available?

Yes. This Notice summarizes the proposed partial settlements with the Settling Defendants and the ongoing lawsuit against the Non-Settling Defendants. More details about the partial settlements are available in the proposed Settlement Agreements themselves. You can see or print copies of

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the Settlement Agreements at [www._____](#). More information about the ongoing class action lawsuit against Non-Settling Defendants, including the Plaintiffs' class action complaint, can also be viewed or printed at [www._____](#), or at the website of Co-Lead Class Counsel, Boies Schiller Flexner LLP and the Moskowitz Firm at [www._____](#).

26. How do I get more information?

The website [www._____](#) provides answers to common questions about the lawsuit, the partial settlements, and other information to help you determine whether you are a Settlement Class Member, whether you are eligible for a payment, and when Settlement Funds will be distributed. You may also call or write to the Notice and Claims Administrator with your questions at:

Notice and Claims Administrator

Voyager Collapse Settlement

[TK]

PLEASE DO NOT CONTACT THE COURT. YOU SHOULD DIRECT ANY QUESTIONS YOU MAY HAVE ABOUT THIS NOTICE OR THE PARTIAL SETTLEMENTS TO THE NOTICE AND CLAIMS ADMINISTRATOR OR TO CLASS COUNSEL.

You may also seek the advice and counsel of your own attorney at your own expense, if you desire.

Questions? Visit [www.xxxx.com](#)